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Ms. Deborah Tate  
Pre-Hearing Officer  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

TN REGULATORY AUTHORITY  
DOCKET ROOM

December 24, 2002

RE: CSA Rulemaking Proceeding  
TRA Docket #00-00702

Dear Ms. Tate:

Thank you for our telephone conversation. In response to your request, I am forwarding the following general recommendations from our company regarding BellSouth Customer Service Agreements.

1. It is our position that all proposed and/or approved CSA's be rapidly posted under a single heading on the TRA website in their textual entirety, including BellSouth (BS) GSST Tariff reference numbers. This would encourage public access, full disclosure, and be beneficial to consumers.
2. BS CSA's should not be offered with a restricted monthly billing cap. Customers billing more than the limiting monthly amount (e.g., \$5000.00, \$50,000.00, or \$100,000.00) are excluded from ordering. A monthly billing cap means CLEC's are effectively discriminated against and consumers are consequently offered fewer choices.
3. All BS CSA's should be available for CLEC resale and should be subject to TRA mandated 16% wholesale purchase. CSA's offered within 90 day promotional windows means that such CSA pricing is unavailable to CLEC's and thus are effectively discriminated against. Typical Bell South/CLEC Interconnect agreements include a provision excluding "90 promotions" from resale. It is common for CSA's to sunset and renew as 90 day promotions effectively making the product offering permanent but precluding CLEC's from taking advantage of lower CSA pricing. Consumers are consequently offered fewer choices.

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4. Once approved, all CSA's should be categorized under a single heading or location within the BS GSST tariff for logical reference.

5. CSA's should not be offered only for specific customers or class of customers. CSA's and/or any tariff amendments altering tariff pricing should be applicable across the board, e.g., to all consumers.

A significant variation on the "Customer Service Agreement" is a Bell South product line called "Business Solutions." Bell South "Business Solutions" offer promotional pricing for small business POTS services at about half the regular GSST pricing. Bell South establishes tariff references and/or internal procedures that define specific rate center availability from which "Business Solutions" products may be sold. Bell South regularly violates these policies by making "Business Solutions" discount pricing available outside of defined service areas. Bell South "Business Solutions" pricing and definitions are currently found in the Bell South "B" tariff normally reserved for data services making them nearly impossible to find. It is our understanding that CLEC 16% discount is not available on Bell South "Business Solutions" meaning CLEC's are effectively discriminated against and consumers are consequently offered fewer choices

While this list is not exhaustive, we feel that these few improvements would insure a more open, fair, and equitable deployment of CSA's. Our company agrees that lower pricing is beneficial to Tennessee consumers. A general theme may be read into our requests: we view full and complete public access, non-discriminatory product offering, and CSA availability to CLEC resale inclusive of TRA 16% discount as necessary characteristics for a healthy CSA process and the enhancement of consumer choice and competition.

Thank you,

A handwritten signature in black ink, appearing to read "J. Harlan".

Jonathan V. Harlan, C.E.O.  
Aeneas Communications, LLC